

 ORIGINAL

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ASHLEY ADAMS  
716 N Barrett Lane  
Christiana, DE 19702  
Mailing address:  
PO Box 7652  
Newark, DE 19714

PLAINTIFF

v

JO ELLEN CHAPEN SHELDON  
708 Pebble Beach Drive  
Elkton, MD 21921

DEFENDANT

DISTRICT COURT

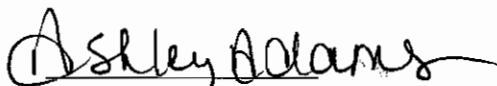
No. 04-251 JJF

JURY TRIAL

**NOTICE OF MOTION**

**MOTION FOR ORDER FOR PROCEDURES FOR FILING SUMMARY  
JUDGMENT MOTIONS**

**COMES NOW**, Plaintiff Ashley Adams, requesting MOTION FOR  
ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT  
MOTIONS, setting forth the reasons as follows, to be heard at the Court's  
convenience.



Ashley Adams  
July 16, 2007

*RG sum*  
2007 JUL 16 AM 11:44  
FILED  
U.S. DISTRICT COURT  
DISTRICT OF DELAWARE

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**MOTION**

**MOTION FOR ORDER FOR PROCEDURES FOR FILING SUMMARY  
JUDGMENT MOTIONS**

Plaintiff, Ashley Adams, pro se, hereby moves this  
Honorable Court for ORDER FOR PROCEDURES FOR FILING SUMMARY  
JUDGMENT MOTIONS AND RESPONSES and, in support thereof,  
states the following:

(1)

Scheduling Order dated December 07, 2006, states:

1. Discovery. (e) Reports from retained experts required by Fed. R. civ. P. 26(a) are due from the party which has the burden of proof by April 30, 2007; Rebuttal report are due by May 31, 2007.

2. Discovery Disputes. (a) A party seeking discovery which the opposing party refuses to provide shall file a motion (no brief) pursuant to Rule 37 of the Federal Rules of Civil Procedure and Local Rule 37.1.
3. Case Dispositive Motions. Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before July 2, 2007. **The court will issue a separate Order regarding procedures for filing summary judgment motions.**

(2)

Plaintiff is not aware of any such Order in existence and the Order is not docketed in the Docket Sheet. Plaintiff requires the procedures in order to respond appropriately.

(3)

Defendant's Summary Judgment is based on a 'Discovery Dispute' item (2) above. Defendant, if filed a motion for Discovery (dispute), the items/issue would have been resolved prior to the necessity of filing a Motion for Summary Judgment.

(4)

Plaintiff, Ashley Adams, has provided to Defense Attorney, Beth Christman, numerous documents with evidentiary findings supporting Plaintiff, Ashley Adams' suit, and was not informed of any missing documents. Plaintiff, Ashley Adams would be delighted to submit the necessary and requested documents that supports evidence of her 'broken neck' resulting from the negligence of Jo Ellen Sheldon Chapen on April 23, 2002, but Plaintiff, Ashley Adams was informed all documents were in possession of Defendant's Attorney, Beth Christman,

and Defense Attorney, Beth Christman, did not state otherwise to notify Plaintiff, Ashley Adams of missing or needed documents, yet files a Motion for Summary Judgment.

**WHEREFORE**, Plaintiff, Ashley Adams asks this Honorable Court for the 'Court Ordered Procedures' as outlined in the scheduling document to be Ordered, hence, denying Defendant's Motion for Summary Judgment as it now stands filed and instruct Defendant to Motion for Discovery dispute if necessary to obtain information from Plaintiff, Ashley Adams.

A handwritten signature in black ink that reads "Ashley Adams". The signature is written in a cursive, flowing style with a long horizontal line extending from the end of the name.

Ashley Adams, *Pro Se*, Plaintiff  
PO Box 7652  
Newark, DE 19714

302-393-3525

Dated July 16, 2007

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**ORDER**

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_ 2007 that Plaintiff Ashley Adams' MOTION FOR ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT MOTIONS is **GRANTED**.

\_\_\_\_\_  
United States District Judge

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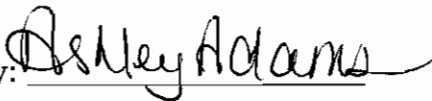
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JURY TRIAL

**REQUEST FOR A HEARING**

Plaintiff, Ashley Adams, hereby requests a Hearing on its Motion for ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT MOTIONS.

By: 

Ashley Adams  
PO Box 7652  
Newark, DE 19714  
302-393-3525  
Plaintiff, pro se

FILING DATE: July 16, 2007

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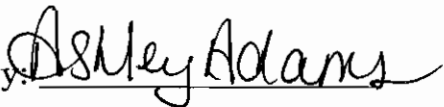
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JURY TRIAL

**NOTICE OF SERVICE**

I hereby give notice that I caused two (2) true and correct copies of the foregoing Motion for ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT MOTIONS to be served upon the following on the date set forth below, via first class mail, postage prepaid, and/or hand-delivered:

Beth H Christman  
CASARINO, CHRISTMAN, & SHALK, P.A.  
800 N King Street, Suite 200  
P.O. Box 1276  
Wilmington, DE 19899  
Attorney for Defendant

By: 

Ashley Adams  
PO Box 7652  
Newark, DE 19714  
Plaintiff, *pro se*

Dated: July 16, 2007

**UNITED STATES DISTRICT COURT  
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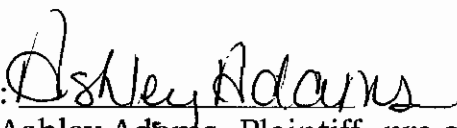
No. 04-251 JJF

TO: The United States District Court  
For the District of Delaware  
The Honorable Judge Joseph J Farnan, Jr  
844 N King Street  
Lock Box 44  
Wilmington, DE 19801

**NOTICE OF SERVICE**

I hereby give notice that I caused notification by first-class mail and /or hand-delivered for Motion for ORDER FOR PROCEDURES FOR FILING SUMMARY JUDGMENT MOTIONS to be served upon the following on the date set forth below:

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CASARINO, CHRISTMAN, & SHALK, P.A.  
800 N King Street, Suite 200  
P.O. Box 1276  
Wilmington, DE 19899  
Attorney for Defendant

By:   
Ashley Adams, Plaintiff, *pro se*  
PO Box 7652  
Newark, DE 19714

**FILING DATE:** July 16, 2007